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~~xxXXXXXXXXXXXX~~ Director

David F. Hales, Director

August 30, 1988

EPA Region 5 Records Ctr.



207247

Mr. David Canosa
J.E. Berger Corporation
5300 Bellevue
Detroit, Michigan 48211

Dear Mr. Canosa:

On August 24, 1988, I conducted a joint final inspection of your property and adjacent areas to determine your company's compliance with all previous directives to cleanup and remove for proper disposal all identified Polychlorinated Biphenyl (PCB) contaminated areas and items. On this date I verified the final cleanup activities conducted by your firm since my last visit as follows:

1. Completion of the cleaning and repaving of the alley between Kirby, Canton, Frederick and Concord Streets.
2. Completion of the excavation of contaminated soils of concern in Lot 3.
3. The removal of contaminated blocks, soil, asphalt and debris of concern from Lot 2.
4. The removal of approximately 660 gallons of PCB water collected from previously cleaning out storm drains in the vicinity of your property.
5. Removal of 1 pallet and 2 drums of PCB capacitors.

This inspection, in conjunction with all our previous inspections, indicates that all the types of PCB contamination originally discussed in Andrew Hogarth's September 19, 1986 letter (attached) have been addressed by your firm. Briefly, these include the following:

- a.) Sediment and debris along curbs.
- b.) Asphalt and concrete contamination.
- c.) Catch basins.
- d.) Alley near Lot 3 (previously described).
- e.) Loading docks.
- f.) Right-of-way areas (between curb and sidewalk).
- g.) Residential yards.
- h.) Stored drums and tanks.

In addition, all PCB contaminated electrical equipment (i.e. capacitors, etc.) previously stored on your property have been removed for disposal.

Based upon our review of the substantial numbers of samples taken and the corrective actions implemented by your firm, we believe your firm has completed the cleanup, removal and disposal of all known contaminated areas and items, on and in the vicinity of your property, that contain PCBs at levels of concern.

I would like to express my personal gratitude to you and your firm for its perseverance, cooperation and commitment in completing the cleanup work described above. Thank you.

Sincerely,



Brian Monroe
Environmental Quality Analyst
Remedial Action Section
Environmental Response Division
517-373-6808

Attachment

cc: Ms. Daria Killinger - Levin, Levin, et al.
Mr. George Gaines, City of Detroit H.D.
Mr. Donald Hamill, City of Detroit H.D.
Ms. Beth Schenkier, U.S. EPA, ORC (5CA-TUB-03)
Mr. Terrance Bonase, U.S. EPA, TSCA (5SPT-7)
Mr. John Bohunsky, MDNR, WMD, Region III
Mr. Tom Work, MDNR, ERD, Region III
Mr. Anthony Pitts, MDNR, ERD-Detroit
Mr. Gary Klepper, MDNR, ERD
Ms. Claudia Kerbawy, MDNR, ERD
File-Frederick Street PCB Site/PEAS No. 2446-86

September 19, 1986

Mr. David Canosa
J.E. Berger Corporation
5300 Bellevue
Detroit, Michigan

Dear Mr. Canosa:

This is in response to a letter to me from your company's consultant, Bennett Engineering, dated August 11, 1986, concerning the PCB environmental problem on and in the vicinity of your facility, located at 5300 Bellevue in Detroit. The work proposed by your consultant in his letter was based upon information available as of August 11, 1986. Since that time, additional sampling has documented the need to extend the area of street sediment and debris cleaning. The additional streets where sediment and debris removal is required, along with several additional categories of PCB off-site contamination that will also require clean-up, are identified in the attached "Frederick Street PCB Site--Detroit, Cleanup Work Plan" and accompanying map. In brief, this cleanup work plan directs your company to remediate through cleanup activities the following types of off-site PCB contamination identified to date.

- a. Sediment and debris along curbs.
- b. Asphalt and concrete contamination.
- c. Catch basins.
- d. Unpaved soil sections of alley.
- e. Loading docks (additional testing is required in these areas).
- f. Right-of-way areas (between curb and sidewalk).
- g. Residential yards.

This letter only addresses off-site contamination. Since some additional sampling will be necessary on-site in Lot #1, Lot #2, Lot #3 and your building, sufficient information does not exist to adequately design a cleanup program for on-site contaminated areas at this time. Therefore, you are directed to continue your sampling effort in these areas. Brian Monroe and Richard Tazsreak of my staff will assist your consultant in identifying where additional data is necessary. Mr. Monroe can be contacted at 517-373-6808 or Mr. Tazsreak can be reached at 517-373-8248.

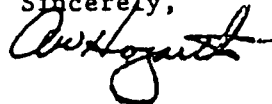
In order to track your company's progress in cleaning up the off-site areas of contamination and to assure prompt cleanup, the Department of Natural Resources is requiring that you complete cleanup activities in accordance with all of the following deadlines:

Mr. David Canosa
September 19, 1986
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1. Initiate off-site cleanup activities described in the attached work plan by no later than September 29, 1986. As part of this start-up operation you must submit a schedule showing the order in which you intend to proceed in cleaning all the required streets. This schedule must also specify your first day of cleanup. This schedule must be received at least 3 working days prior to initiating off-site cleanup activities but in no case later than Wednesday, September 24, 1986. This letter should be directed to Mr. Richard Taszreak of the MDNR with a copy sent to Dr. John E. Waller of the City of Detroit Health Department.
2. Complete all remaining on-site sampling in Lot #1, Lot #2, Lot #3 and the loading/entrance areas of your building by no later than October 6, 1986. All results must be presented to Department of Natural Resources staff by this date. Samples must be collected utilizing a grid system in each of the three lots.
3. Complete all off-site cleanup activities described in the attached Frederick Street PCB Site-Detroit, Cleanup Work Plan by no later than November 1, 1986.
4. Complete cleanup activities on lots and loading dock areas as required in a later letter that will be directed to your company from our agency. These cleanup activities including all off-site disposal of PCB and other wastes shall occur on or before November 30, 1986. Such shipment will be to an approved off-site facility and must be in full compliance with all applicable State and Federal laws.

If you have any questions, please contact Mr. Monroe at 517-373-6808.
Thank you for your attention in this matter.

Sincerely,



Andrew W. Hogarth
Chief
Remedial Action Section
Groundwater Quality Division
517-373-8448

cc: Dr. J. Waller, City of Detroit H.D.
Mr. L. Chadzynski, MDPH
Mr. David Bennett, Bennett Engineering
Mr. D. Dennis, GQD
Ms. C. Kerbawy, GQD
Mr. B. Monroe, GQD
Mr. R. Taszreak, GQD
Mr. T. Pitts, GQD
File-Frederick St. PCB Site ✓

FREDERICK STREET PCB SITE - DETROIT CLEANUP WORK PLAN

I Introduction

The Frederick Street PCB site was discovered after a July 7, 1986, Toxic Substance Control Act (TSCA) inspection was made of the J.E. Berger Corporation facility by Michigan Department of Natural Resources' (MDNR) staff. This facility is located at 5300 Bellevue in Detroit and rebuilds large industrial motors and electrical control panels. During the July 7, 1986, inspection, several soil samples were collected on-site, and one sample was collected in a public alley adjacent to one of the three company owned fenced storage yards. This alley sample was analyzed and results showing 340,000 ppm PCB were transmitted to Phil Schrantz of the Hazardous Waste Division on the afternoon of Friday, July 18, 1986. MDNR and EPA staff contacted J.E. Berger Corporation officials on that same date and directed them to immediately control the area around this PCB hot spot with snow fencing and twenty-four hour security guards. The company took these actions. Company and MDNR staff have together taken well over 200 environmental and waste samples since the initial TSCA inspection and subsequent discovery of high PCB levels off the plant property. These samples (approximately one-half collected by MDNR staff) are to help define the full extent of on-site and off-site environmental contamination in the vicinity of the initial PCB hot spot, and to further identify PCB source areas.

II Definition of the Extent of Contamination

Determining the extent of contamination has meant sampling J.E. Berger Corporation property, and surrounding residential and street areas. To date, sampling of J.E. Berger Corporation property has yielded the following general results and conclusions:

1. Building and Loading Dock - Loading dock and entrance areas have shown PCB levels as high as 210 ppm. To date, no samples inside the J.E. Berger Corporation building have been collected. However, based on the loading dock and entrance area results, such sampling is necessary to determine if the building could be a contamination source area.
2. Storage Lots #1, #2 and #3 (see attached map) - Levels as high as 50,000 ppm PCB have been detected in Lot #3, as high as 55,000 ppm PCB in Lot #2, and as high as 290 ppm PCB in Lot #1. Approximately 40-50 samples of soils have been collected by MDNR staff in the storage areas. Additional samples have been collected by J.E. Berger staff.
3. Stored Drums and Tanks of PCB and/or Non-PCB Wastes - Numerous samples of drums and tanks have been collected by J.E. Berger. Additional samples have been collected by MDNR staff. These drums and tanks have now been relocated inside the J.E. Berger Corporation facility. Sample results have indicated that the drums contain low levels of PCB oils.

Sampling of the surrounding residential and street areas has yielded the following general results and conclusions:

1. Streets and Alleys

- a. Sediment and Debris Along Curb - This material has been sampled extensively in the vicinity of the J.E. Berger facility. Values in the street sediments range from 1 ppm PCB (level of detection) to 10,000 ppm PCB.
- b. Asphalt Contamination - Asphalt contamination ranges up to 320 ppm PCB. This is a result of asphalt samples taken near Lot #3.
- c. Catch Basins - These have not yet been sampled, but are assumed to contain street sediment with PCB levels similar to that present in the corresponding curb areas draining to the corresponding catch basins.
- d. Unpaved Soil Areas - This primarily refers to relatively short sections of the alley located between Kirby, Frederick, Canton, and Concord Streets. PCB levels range as high as 340,000 ppm in this category.

2. Soil Areas Outside Company Property

- a. Right-of-Way-Areas (between curb and sidewalk) - Results from composite samples collected in these areas range from not detected (less than 1 ppm) to 33 ppm PCB.
- b. Residential Yards - PCBs were detected in one yard sample directly north of Lot #3, where the results showed 27 ppm PCB. Because this was a composite composed in part of an area directly adjacent to the heavily contaminated alley, resampling of this residential yard was undertaken. The second composite showed a level of 7 ppm PCB. PCB's were also detected at concentrations up to 220 ppm in the residential back yards directly adjacent to the alley located between Kirby, Frederick, Canton and Concord Streets.

III Proposed Cleanup Areas

As a result of currently available data, a cleanup program must be initiated on J.E. Berger Corporation property and surrounding residential and street areas. (See Attachment A outlining cleanup categories.) The affected surrounding residential and street areas have been largely identified, and the company must begin its overall cleanup program with the cleanup of the streets, alleys, associated yards and right-of-ways in the residential areas on the attached map. This area may be expanded if additional testing currently planned reveals further areas of contamination. Within the street and alley areas of identified contamination, the following actions will take place:

- a. Sediment and Debris Along Curb - All sediment curbside debris in the street and alley areas identified on the attached map will be removed by the company utilizing the High Efficiency Particulate Air (HEPA) filter vacuum method described in the August 11, 1986, letter from the company's consultant, Bennett Engineering. Alternate cleanup methods may be necessary if this is not successful. All waste materials generated in this operation will be disposed of in accordance with all state and federal laws.
- b. Asphalt and Concrete Contamination - The concrete portion of the alley between Kirby, Frederick, Concord, and Canton Streets will need to be cleaned to remove soil and then resampled. Depending on results, this alley may need to be cleaned with appropriate wash solution and then paved over, or scarified (milled) and paved. The resulting volume of contaminated material (solids and liquids) will be contained and disposed of in accordance with all federal and state laws. Concord Street will be cleaned with appropriate wash solution from its intersection with Frederick Street to a location 100 feet north. Canton Street will be cleaned with appropriate wash solution from its intersection with Frederick Street to a location 100 feet north, and also from the same intersection to a location 100 feet south. Disposal of all wash solutions will be in accordance with all federal and state laws. Frederick Street between Concord and Canton Streets will need to be cleaned with appropriate wash solution or scarified (milled) prior to repaving. Verification of cleanup effectiveness by sampling will be needed prior to repaving areas. (Note: All plans for working in the streets and alleys (vacuuming, washing, scarifying (milling) and repaving must be specifically approved by the City of Detroit and be in accordance with all directives from the appropriate City of Detroit agencies.)
- c. Catch Basins - All catch basins in the street and alley sections that are designated for cleaning of sediment and debris will also be cleaned using vacuum methods, or other techniques acceptable to MDNR staff. (See IIIa above and the attached map.) All waste materials will be disposed of as in IIIa above.
- d. Unpaved Soil Sections of Alley - These will be excavated and removed for proper disposal in accordance with all federal and state laws. Post excavation resampling will be used to determine adequacy of excavation. The unpaved soil sections are located in the alley between Kirby, Frederick, Concord, and Canton Streets.
- e. Loading Docks - The loading dock areas of the J.E. Berger building will be vacuumed and cleaned with appropriate wash solution. The loading dock areas will be resampled for adequacy of cleanup. Depending on results, the loading dock area(s) may need to be paved over or scarified (milled) and paved over.

For soil areas outside the company property, the following will be done:

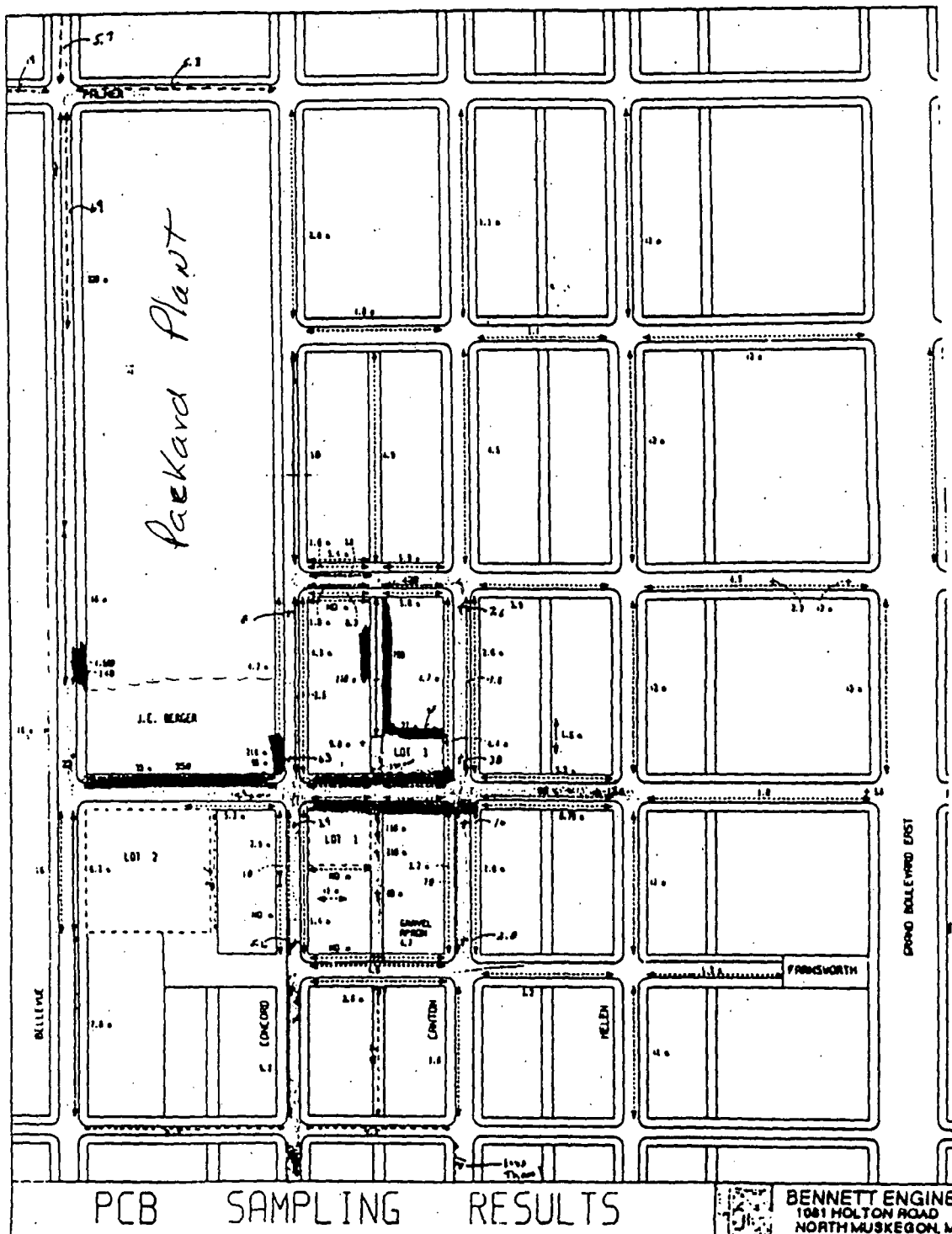
- a. Right-of-Way Areas (between curb and sidewalk) - The north right-of-way area on Frederick Street between Bellevue and Concord Streets will be excavated and removed. The right-of-ways on either side of Frederick Street, between Concord and Canton Streets, will also be excavated, unless sampling efforts show acceptable levels of PCB contamination. All excavated right-of-way soils will be disposed of in accordance with all state and federal laws. Excavated areas will be restored fully.
- b. Residential Yards - The residence at 5315 Canton Street has a side yard directly north of Lot #3. This side yard (adjacent to the north side of the Lot #3 fence) will be excavated, resampled to determine adequacy of cleanup, and restored fully. Since the initial Frederick Street PCB work plan was drafted, additional sample results have returned for residential backyards along the alley between Concord, Canton, Kirby and Frederick Streets. This data indicates that soil areas on both sides of this alley must be scraped and removed for disposal in accordance with all applicable state and federal laws. This sampling indicates that contamination at levels as high as 220 ppm PCB extends at least 3 feet to either side of the alley, essentially its entire length. Therefore, removal of these additional identified soil contamination areas must also occur. The company should excavate more than the identified 3 feet strip on either side of the alley to assure adequate cleanup. If the required post excavation sampling of any of these areas shows PCB contamination of concern remaining, the company will be required to excavate further. Homeowner approval must be obtained prior to beginning work in each yard. Further sampling of all yards will occur to determine if more cleanup is necessary. All waste materials from the residential yards will be disposed of in accordance with all applicable state and federal laws.

At this time, test results and the testing evaluation program is incomplete to determine remediation for the J.E. Berger Corporation property (Lot #1, Lot #2, Lot #3 and the J.E. Berger building). Therefore, the company is directed to proceed with remediation of off site contamination areas rather than waiting for development of a comprehensive cleanup program for company property.

The basis for removal of soils inside the three storage areas will be determined by delineating specific areas of contamination and removing those soiled areas. Possible remediation of the J.E. Berger building will be determined through sampling selected interior areas. A comprehensive systematic grid sampling of lots #1, #2 and #3 will be designed and implemented. A grid system will be constructed for each of the three lots, and a composite sample collected within each grid. These composite samples will serve as the basis for identifying which portions of the three lots need to be excavated and removed for proper disposal. Samples will be collected inside the J.E. Berger Corporation building in ramp areas of the two loading areas to determine whether these interior areas are a source of the street and other PCB contamination in the vicinity of the facility. All such sampling shall occur with results presented to MDNR staff no later than October 1, 1986. All drums and tanks of industrial wastes currently on-site will be properly disposed of in accordance with all state and federal laws.

IV Air Monitoring Requirements

Air monitoring must be conducted to demonstrate to the satisfaction of MDNR staff that cleanup operations are not creating unacceptable air emissions.



- Street areas that need to be cleaned
- ~~Right of - ways~~ that need to be cleaned.
- ~~Loading dock areas~~
- ~~Residential yards~~ that ~~need to~~ be cleaned